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11 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12 STEPHEN RUSSELL

13 v.
14 Plaintiff,

NIR MAMAN, et al.,

15 Defendants.

Case No. 18-cv-06691-RS

16
17 JOINT STIPULATION RE EXTENSION
18 OF CASE SCHEDULE AND ORDER AS
19 MODIFIED BY THE COURT

20
21 NIR MAMAN, et al.

22 Third-Party Plaintiffs,

23 v.

RONEN SHLOMO, et al.

24 Third-Party Defendants.

1 Pursuant to Federal Rule of Civil Procedure 16(b)(4), Plaintiff Stephen Russell (“Plaintiff”),
 2 Defendants Nir Maman, Ryan Micheletti, George Akkelquist, Legion Industries, Inc. d/b/a Shield Corps
 3 Security, DFW Metroplex Training Academy, and CT707 Israeli Krav Systems, Inc. (“Defendants”),
 4 and Third-Party Defendants Ronen Shlomo and Bsecure, (collectively, “the Parties”), jointly stipulate
 5 and respectfully request that the Court extend the current case schedule by approximately 90 days for
 6 good cause shown:

7 WHEREAS, the Court issued the controlling case schedule on June 19, 2020, with a fact
 8 discovery deadline is March 5, 2021;

9 WHEREAS, despite the Parties’ diligent efforts to schedule depositions and exchange discovery,
 10 there are over a dozen depositions remaining, including several third-party depositions, the completion
 11 of the individual deposition of Defendant Nir Maman, and the Federal Rule of Civil Procedure 30(b)(6)
 12 deposition of CT707;

13 WHEREAS, Defendant Maman’s and CT707’s depositions were postponed due to health issues
 14 and have not yet been rescheduled due to Defendant Maman’s health;

15 WHEREAS, Third Party Deponents Steven Walsh and Maura Walsh failed to appear at their
 16 duly noticed depositions on February 18, 2021 and Plaintiff is attempting to meet-and-confer with the
 17 deponents;

18 WHEREAS, the Parties are still meeting and conferring in good faith regarding discovery
 19 responses and document productions;

20 ACCORDINGLY, it is therefore STIPULATED and AGREED, subject to Court approval, that
 21 the case schedule be amended as follows:

Event	Current Deadline	Deadline
Close of Fact Discovery	March 5, 2021	June 4, 2021
Deadline to Designate Experts in Accordance with FRCP 26(a)(2)	March 5, 2021	June 4, 2021

1 Deadline to Designate Supplemental and Rebuttal Experts	April 2, 2021	June 18, 2021
3 Close of Expert Discovery	May 7, 2021	July 9, 2021
4 Deadline for Dispositive Motions	May 20, 2021	MSJ due: August 6, 2021; Opposition due: August 20, 2021; Reply due: August 27; Hearing: September 16, 2021
7 Pretrial Conference	August 11, 2021	November 10, 2021
8 Jury Trial	August 23, 2021	November 22, 2021

10 DATED: February 24, 2021

Respectfully submitted,

11 CONRAD | METLITZKY | KANE LLP

12 /s/ Warren Metlitzky
13 WARREN METLITZKY
14 JOSHUA S. WHITE
15 ELIZABETH A. KIM
16 Attorneys for Plaintiff Stephen Russell

17 LAW OFFICES OF YOHAN LEE

18 /s/ Jake Jung
19 JAKE JUNG
20 CHUNG ROH
21 Attorneys for Defendants Nir Maman and CT707
22 Israeli Krav Systems, Inc.

23 LAW OFFICES OF DEK KETCHUM

24 /s/ Dek Ketchum
25 DEK KETCHUM
26 JENNY D. SMITH
27 Attorneys for Defendants George Akkelquist and
28 DFW Metroplex Training Academy

RESNICK LOUIS, P.C.

/s/ Shari Dana Goggin
SHARI DANA GOGGIN
ROBERT ALLEN HUFNAGEL

1 Attorneys for Defendants Legion Industries, Inc.,
2 Ryan Micheletti, and Shield Corps Security
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4 LEWIS BRISBOIS BISGAARD & SMITH
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6 /s/ Alexander Graft
7 ALEXANDER A. GRAFT
8 KENDALL A. LAYNE
9 Attorneys for Bsecure and Ronen Shlomo
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11 **ORDER**

12 Pursuant to stipulation and for good cause shown, IT IS SO ORDERED that the case schedule shall be
13 amended as proposed.
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15 DATED: February 25, 2021



16 Honorable Richard Seeborg
17 Chief United States District
18 Judge
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